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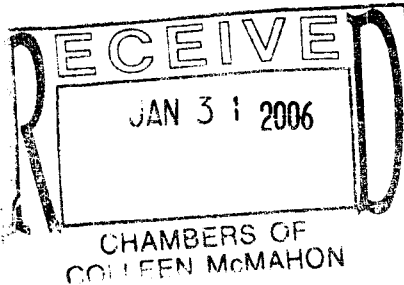
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Via Facsimile

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January 31, 2006

Hon. Colleen McMahon
United States District Court
Southern District of New York
United States Courthouse
300 Quarropas Street, Room 533
White Plains, New York 10601-4150

Re: *Leighton Technologies LLC v. Oberthur Card Systems, S.A.*,
No. 04 Civ. 02496 (CM)(LMS)

Dear Judge McMahon:

We represent the defendants Oberthur Card Systems, S.A. ("Oberthur") and Oberthur Card Systems of America Corporation in the above-captioned matter. We write this letter on behalf of the defendants and on behalf of plaintiff Leighton Technologies LLC ("Leighton"), which joins in the request set forth below.

Oberthur has moved this Court for summary judgment of patent invalidity. The motion was fully submitted as of January 5, 2006. Oberthur requested oral argument of the motion. Leighton's counsel has advised us that Leighton also wishes to have oral argument of the motion.

The parties are working together to complete a number of depositions by the fact discovery cutoff of April 6, 2006. To this end, we are scheduling depositions that will take place in the coming weeks in California, Ohio and Washington as well as in England, France, Germany, Italy, Thailand and possibly other locations in the United States and Europe.

In light of the time constraints and the complicated arrangements involved, the parties wish to ensure that the deposition schedule will not conflict with oral argument of the pending motion. The parties therefore jointly respectfully request that the Court advise as to whether they should keep free any dates between today and April 6, 2006 for possible oral argument of the motion.

Very truly yours,

James David Jacobs/SRK
James David Jacobs

cc: Robert Gutkin, Esq. (via Facsimile)

*I fear this is not
at the top of my
list. go on and do
your EBT's.*

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